

IN THE UNITED STATES  
COURT OF FEDERAL CLAIMS

DIMARE FRESH, INC., a Florida corporation; DIMARE  
RUSKIN, INC., a Florida corporation; DIMARE JOHNS  
ISLAND, INC., a Florida corporation; GARGIULO, INC., a  
Delaware corporation; DMB PACKING CORP., a Delaware  
corporation; ARTESIAN FARMS INCORPORATED, a  
Florida corporation; KUZZENS, INC., a Virginia  
corporation; FARM OP, INC., a Florida corporation;  
BUTLER FARMS, INC., a Florida corporation; SK  
ENTERPRISES OF NORTH FLORIDA, INC., a Florida  
corporation; TWO FEATHER FARM, INC., a Georgia  
corporation; JUNIPER TOMATO GROWERS, INC., a  
Florida corporation; TOWNSEND BROTHERS FARMS,  
INC., a Florida corporation; PATTERSON FARM, INC., a  
North Carolina corporation; WEST COAST TOMATO,  
LLC, a Florida limited liability company; HIGH HOPE  
FARMS, LLC, a Florida limited liability company;  
HOPKINS FARMS, LLC, a Georgia limited liability  
company; MOBLEY GREENHOUSE INVESTMENTS,  
LLC, a Georgia limited liability company; QUALITY  
PRODUCE, LLC, a Florida limited liability company; JWM  
FARMS, LLC a Georgia limited liability company;  
FLOWERS FARMS, LLC, a Georgia limited liability  
company; GREGORY ENTERPRISES, LLC, a Florida  
limited liability company; MICHAEL BOREK FARMS,  
LLC, a Florida limited liability company; CIRCLE C  
PRODUCE, a Georgia limited liability company; FRED  
JACKSON d/b/a FRED JACKSON FARMS; DALE  
MURRAY and GREG MURRAY individually and d/b/a  
MURRAY FARMS; FRANK and ORA DIEHL d/b/a  
FRANK DIEHL FARMS and DIEHL and LEE FARMS and  
DAN JONES, individually,

Plaintiffs,

vs.

THE UNITED STATES,

Defendant.

**Case No. 13-519 C**  
**(Judge Bush)**

**PLAINTIFFS' MOTION TO JOIN ADDITIONAL PLAINTIFF**

Plaintiffs move to join an additional party Plaintiff to the Amended Complaint pursuant to Court of Federal Claims Rules 15(a)(2) and 20(a)(1). The proposed additional party Plaintiff is East Coast Brokers and Packers, Inc., a Florida corporation, c/o Gerard A. McHale, Jr., as Trustee. The joinder should relate back to the date of the original Complaint, per Court of Federal Claims Rule 15(c)(1).

The proposed additional Plaintiff's claim arises from the same transactions, occurrences, or series of transactions or occurrences alleged in the Amended Complaint, and involves the same factual and legal issues as the claims in the Amended Complaint. The proposed joinder will not otherwise change the Amended Complaint, which should be treated as amended by the joinder of the additional Plaintiff as one of the "Tomato Farmers and Producers" who are presenting claims for compensation.

Undersigned counsel has contacted counsel for the Defendant United States and reports that there is no objection to this Motion.

Wherefore, this Motion should be granted and East Coast Brokers and Packers, Inc., a Florida corporation, c/o Gerard A. McHale, Jr., as Trustee, deemed to be added as a party Plaintiff in this case.

I HEREBY CERTIFY that the foregoing was filed with the Court's CM/ECF filing system this 12th day of May, 2014.

Respectfully submitted,

s/ M. Stephen Turner

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